

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MICHAEL BROWN, SR., et.al,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:15-cv-00831-ERW
)	
CITY OF FERGUSON, MISSOURI, et.al.)	
)	
Defendants.)	

AFFIDAVIT OF PROSECUTOR KATHI ALIZADEH


I, Kathi Alizadeh, first being duly sworn, state as follows:

1. I am an adult resident of the State of Missouri, I am over 21 years of age, and I am competent to provide this affidavit. This affidavit is based upon my personal knowledge.
2. I am employed by St. Louis County, Missouri as an Assistant Prosecuting Attorney in the Office of the Prosecuting Attorney, 100 S. Central Avenue, Clayton, MO 63105.
3. I was assigned primary responsibility to assist the special grand jury convened *In The Matter Of The Grand Jury Investigation Of The Incident Of 8/9/2014*, Cause No. 14SL-MC15812, Division 7, St. Louis County Circuit Court, to investigate the shooting death of Michael Brown.
4. During the grand jury investigation, I had requested the grand jury issue a subpoena for a witness (hereafter referred to as "Grand Jury Witness Doe"), to give testimony before the grand jury, due to his/her having given recorded and unrecorded statements to FBI agents wherein he/she indicated he/she was an eyewitness to the events under investigation.
5. Grand Jury Witness Doe subsequently testified before the grand jury, recanting the statements he/she made to the FBI.

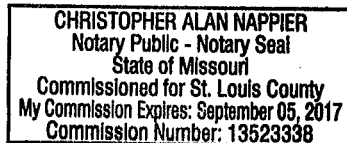
6. On February 24, 2016, counsel for Grand Jury Witness Doe telephoned me. He stated his client read an article on February 22, 2016, in the St. Louis Post Dispatch about disclosure of grand jury witness's names. The attorney told me that Grand Jury Witness Doe was fearful of retaliation and retribution for his/her grand jury testimony, recanting his/her previous statements, which he/she fears might be perceived by some as not sympathetic to or supportive of Michael Brown.

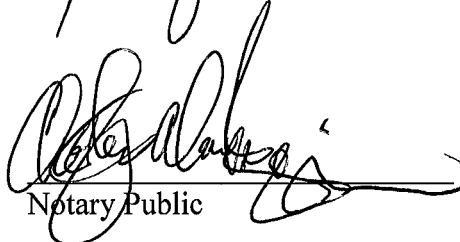
7. Counsel for Grand Jury Witness Doe expressed concerns to me regarding the "leaking" of his client's identity, and reiterated his client's real and substantial fear for his/her personal safety if identifying information was ordered to be disclosed.

FURTHER AFFIANT SAYETH NOT.


Kathi Alizadeh, Affiant

Subscribed and sworn this 3RD day of March, 2016




Notary Public

My commission expires: